

**Cuyahoga County Court of Common Pleas
Criminal Court Division**

<p>State of Ohio,</p> <p style="margin-left: 100px;">Plaintiff</p> <p style="margin-left: 100px;">VS.</p> <p>John Doe #2,</p> <p style="margin-left: 100px;">Defendant</p>	<p>A True Bill Indictment For</p> <p>Rape - F1 §2907.02(A)(2)</p> <p>12 Additional Count(s)</p>	
Dates of Offense (on or about) 04/25/1993 to 09/15/1994	The Term Of January of 2013	Case Number 573708-13-CR

The State of Ohio, }
Cuyahoga County } SS.

Count One **Rape - F1**
 §2907.02(A)(2)

Defendants John Doe #2

Date of Offense On or about April 25, 1993

The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OHIO, do find and present, that the above named Defendant(s), on or about the date of the offense set forth above, in the County of Cuyahoga, unlawfully

did engage in sexual conduct, to wit: fellatio, with Jane Doe I by purposely compelling her to submit by force or threat of force.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count Two **Rape - F1**
 §2907.02(A)(2)

Defendants John Doe #2

Date of Offense On or about April 25, 1993

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did engage in sexual conduct, to wit: vaginal intercourse, with Jane Doe I by purposely compelling her to submit by force or threat of force.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Jinnie MATOWITZ

Foreperson of the Grand Jury



Prosecuting Attorney

Count Three **Kidnapping - F1**
 §2905.01(A)(2)
Defendants John Doe #2
Date of Offense On or about April 25, 1993

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, by force, threat, or deception, purposely remove Jane Doe I from the place where she was found or restrain the liberty of her for the purpose of facilitating the commission of a felony to wit: Rape, R.C. 2907.02 and/or flight thereafter.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count Four **Kidnapping - F1**
 §2905.01(A)(4)
Defendants John Doe #2
Date of Offense On or about April 25, 1993

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, by force, threat, or deception, purposely remove Jane Doe I from the place where she was found or restrain the liberty of her for the purpose of engaging in sexual activity, as defined in Section 2907.01 of the Revised Code, with Jane Doe I against her will.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count Five **Rape - F1**
 §2907.02(A)(2)
Defendants John Doe #2
Date of Offense On or about April 25, 1993

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did engage in sexual conduct, to wit: fellatio, with Jane Doe I by purposely compelling her to submit by force or threat of force.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Jinnie MATOWITZ

Foreperson of the Grand Jury

T. J. McFinty

Prosecuting Attorney

Count Six **Rape - F1**
 §2907.02(A)(2)
Defendants John Doe #2
Date of Offense On or about April 25, 1993

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did engage in sexual conduct, to wit: vaginal intercourse, with Jane Doe I by purposely compelling her to submit by force or threat of force.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count Seven **Kidnapping - F1**
 §2905.01(A)(2)
Defendants John Doe #2
Date of Offense On or about April 25, 1993

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, by force, threat, or deception, purposely remove Jane Doe I from the place where she was found or restrain the liberty of her for the purpose of facilitating the commission of a felony to wit: Rape, R.C. 2907.02 and/or flight thereafter.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count Eight **Kidnapping - F1**
 §2905.01(A)(4)
Defendants John Doe #2
Date of Offense On or about April 25, 1993

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, by force, threat, or deception, purposely remove Jane Doe I from the place where she was found or restrain the liberty of her for the purpose of engaging in sexual activity, as defined in Section 2907.01 of the Revised Code, with Jane Doe I against her will.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Jinnie MATOWITZ

Foreperson of the Grand Jury

T. J. McFinty

Prosecuting Attorney

Count Nine **Rape - F1**
 §2907.02(A)(2)
Defendants John Doe #2
Date of Offense On or about September 15, 1994

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did engage in sexual conduct, to wit: fellatio, with Jane Doe II by purposely compelling her to submit by force or threat of force.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count Ten **Rape - F1**
 §2907.02(A)(2)
Defendants John Doe #2
Date of Offense On or about September 15, 1994

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did engage in sexual conduct, to wit: vaginal intercourse, with Jane Doe II by purposely compelling her to submit by force or threat of force.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count Eleven **Rape - F1**
 §2907.02(A)(2)
Defendants John Doe #2
Date of Offense On or about September 15, 1994

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did engage in sexual conduct, to wit: anal intercourse, with Jane Doe II by purposely compelling her to submit by force or threat of force.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Jinnie MATOWITZ

Foreperson of the Grand Jury

T. J. McFinty

Prosecuting Attorney

Count Twelve Kidnapping - F1
§2905.01(A)(2)
Defendants John Doe #2
Date of Offense On or about September 15, 1994

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, by force, threat, or deception, purposely remove Jane Doe II from the place where she was found or restrain the liberty of her for the purpose of facilitating the commission of a felony to wit: Rape, R.C. 2907.02 and/or flight thereafter.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count Thirteen Kidnapping - F1
§2905.01(A)(4)
Defendants John Doe #2
Date of Offense On or about September 15, 1994

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, by force, threat, or deception, purposely remove Jane Doe II from the place where she was found or restrain the liberty of her for the purpose of engaging in sexual activity, as defined in Section 2907.01 of the Revised Code, with Jane Doe II against her will.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Jinnie MATOWITZ

Foreperson of the Grand Jury

T. J. McFinty

Prosecuting Attorney